

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. M-19-CR-1502-004
	§	
RAMIRO ALANIZ	§	

NOTICE OF PLEA AGREEMENT

COMES NOW the United States of America, hereinafter referred to as "the Government," by and through its United States Attorney for the Southern District of Texas and its Assistant United States Attorney assigned to this matter, and would respectfully show the Court that the Government and the Defendant have entered into the following plea agreement:

1. Defendant agrees:
 - a. to plead guilty to Count Five of the Third Superseding Indictment;
 - b. Pursuant to 18 U.S.C. § 3663 (a)(3), Defendant agrees and stipulates to restitution to the to the City of La Joya Economic Development Corporation arising from the offense of conviction, such amount to be determined by the Court;
 - c. To forfeit to the United States an amount determined by the Court but not to exceed \$105,000.00 dollars in United States currency, which the defendant agrees was involved in the commission of the offense to which she is pleading guilty; and
 - d. Defendant agrees to make a complete financial disclosure by truthfully executing a sworn financial statement (OBD-500 or similar form) within 14 days. Defendant agrees to authorize the release of all financial information requested by the United States and to take all steps necessary to pass clear title to forfeitable assets to the United States and to fully assist in the collection of restitution and fines, including, but not limited to surrendering title, executing warranty deeds, signing consent decrees, and signing any other documents to effectuate the transfer of any asset.
2. The Government will recommend:
 - a. that the offense level decrease by 2 levels pursuant to U.S.S.G. § 3E1.1(a) if the defendant clearly demonstrates acceptance of responsibility, and

- b. that the Indictment, the Superseding Indictment, the Second Superseding Indictment, and the remaining counts of the Third Superseding Indictment be dismissed at the time of sentencing.

If the Defendant is not a citizen of the United States of America, a plea of guilty may result in removal from the United States, denial of citizenship and denial of admission to the United States in the future. If the Defendant is a naturalized United States citizen, a plea of guilty may result in denaturalization.

This document states the complete and only Plea Agreement between the United States of America and the Defendant, and is binding only on the parties to this Agreement, and it supersedes all prior understandings, if any, whether written or oral, and cannot be modified other than in writing and signed by all parties or on the record in Court. No other promises or inducements have been or will be made to the Defendant in connection with this case, nor have any promises or threats been made in connection with this plea.

ACKNOWLEDGMENTS:

I have read this agreement and carefully reviewed every part of it with my attorney. If I have difficulty understanding the English language, I have had a person fluent in the Spanish language interpret this agreement to me.

Date: 6/16/21 Ramiro Alaniz
Ramiro Alaniz
Defendant

I am the Defendant's counsel. I have carefully reviewed every part of this agreement with the Defendant. I certify that this agreement has been translated to my client by a person fluent in the Spanish language if my client is unable to read or has difficulty understanding the English language.

Date: 6/16/21 Gregorio Lopez
Gregorio Lopez
Counsel for Defense

For the United States of America:

JENNIFER B. LOWERY
Acting United States Attorney

Sarina DiPiazza
Sarina DiPiazza
Assistant United States Attorney

James H. Sturgis
James H. Sturgis
Assistant United States Attorney

APPROVED BY:

Angel Castro
Angel Castro
Assistant United States Attorney in Charge